REMARKS

Favorable reconsideration and allowance of the claims of the present application, as amended, is respectfully requested.

In the present Office Action, the Examiner rejected Claims 1-2, 5-9, 11-13, 16-19, 21-23, 26-30, 32 and 57 under 35 U.S.C. § 102(b) as allegedly being anticipated by Yahoo Screen Pages (dated 10/05/99) pp.1-5, http://web.archive.org/web/19991005031700/http://dir.yahoo.com/Arts/Artists/Masters/Directories/ ("Yahoo").

The Examiner further rejected Claims 33-34, 36-42, 44-50, 52-56 and 58 under 35 U.S.C. §103(a) as allegedly being unpatentable over Yahoo in view of US 5,806,077 to Wecker ("Wecker").

The Examiner further rejected Claims 3-4, 10, 14-15, 20, 24-25 and 31 under 35 U.S.C. §103(a) as allegedly being unpatentable over Yahoo in view of a reference entitled "Privacy Compliance Resources, "Cookies" (dated 2/11/01), pp. 1, http://web.archive.org/web/20010210192514/http://www.idcide.com/pages/res_term.htm ("Cookies").

The Examiner further rejected Claims 35, 43 and 51 under 35 U.S.C. §103(a) as allegedly being unpatentable over Yahoo in view of Cookies and further in view of Wecker.

With respect to the rejection of independent Claims 1, 12 and 22, 33, 41, 49 and 57 as being anticipated by Yahoo, applicants respectfully disagree.

The present invention is directed to a client-side breadcrumbing solution, pure and simple, and applicants respectfully submit that the cited and applied "Yahoo"

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reference does not teach or suggest a breadcrumbing solution being performed entirely <u>on the client side</u> as in the present invention. Moreover, the cited Yahoo reference neither teaches nor suggests the implementation of a breadcrumbing engine that is <u>embedded in the web page</u>, and that performs all the work of collecting the breadcrumbs on the client side such that no work has to be done to collect, store or send the breadcrumb information on the server side.

To clearly set forth this aspect of the invention, Claims 5 and 6 are being canceled and the subject matter thereof being incorporated in amended Claim 1. Likewise, Claims 26 and 27 are being canceled and the subject matter thereof being incorporated in amended Claim 22. Further minor amendments are being made to Claims 1 and 22 in light of the subject matter being incorporated in these amended claims. Similarly, Claim 16 is being canceled and the subject matter thereof being incorporated in amended independent Claim 12 directed to a dynamic client-side breadcrumbing system for improving navigation of a plurality of web pages within a Website, wherein a web server associated with the Website transmits web pages requested by a client, <u>each of the web pages having a breadcrumbing engine embedded therein by the web server</u> that performs all aspects of dynamic client-side breadcrumbing. Claims 12 and amended independent Claim 57 is being further amended to set forth that the step of updating the stored breadcrumbs with the generated breadcrumb to form a breadcrumb navigation trail of breadcrumbs associated with navigation of the web pages is performed <u>at the client</u>.

While the Examiner had indicated in the Office Action in the rejections of Claims 5, 16 and 26 that Yahoo teaches a Yahoo web server embedding said engine-applicants fail to see such a teaching or suggestion in the prior art web-page examples

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comprising the "Yahoo" reference. That is, the "Yahoo" reference only shows some Yahoo! Web pages with breadcrumbing displayed, however, they show nothing of how/where the Yahoo! breadcrumbs are generated. Moreover, they do not show in the information provided that Yahoo! generates the breadcrumbs on the client side. Moreover, with respect to the indication in the Office Action, for example, on page 3, the Examiner states that Yahoo teaches the step of storing breadcrumbs associated with web pages downloaded to the web browser at the client and alleges that:

> downloaded web pages and breadcrumbs are stored in user's computer Internet temp file or cache

Respectfully, the system and method of the present invention as claimed is not relying on the breadcrumbs being downloaded from the server; rather, the breadcrumbs are dynamically generated/stored on the client side.

For these reasons, the Examiner is respectfully requested to withdraw the rejection of amended independent Claims 1, 12, 22 and 57 and all claims dependent directly or indirectly dependent thereon.

With respect to the rejection of independent Claims 33, 41, 49 and 58 as being anticipated by Yahoo in view of Wecker, applicants respectfully disagree for the aforementioned reasons. However, to clearly set forth the inventive features of the invention, Claim 36 is being canceled and the subject matter thereof being incorporated in amended Claim 33. Likewise, Claim 44 is being canceled and the subject matter thereof being incorporated in amended Claim 41. Furthermore, Claim 52 is being canceled and the subject matter thereof being incorporated in amended Claim 49. Again, each of these amended independent Claims 33, 41 and 49 now recite dynamic client-side

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breadcrumbing system for improving navigation of a plurality of web pages within a Website, wherein a web server associated with the Website transmits web pages requested by a client, <u>each of the web pages having a breadcrumbing engine embedded therein by the web server</u> that performs all aspects of dynamic client-side breadcrumbing.

       While the Examiner has applied an additional teaching of Wecker in the rejection of these independent claims, it is respectfully submitted that the reliance on Wecker is misplaced. Wecker appears to be directed to generating a timestamp to indicate the time elapsed from when that user has previously visited that website they have already visited (i.e., accessed thatIweb page). However, Wecker is not concerned about breadcrumbing and its use of timestamps is completely unrelated. That is, Wecker's use of timestamps relates to display of information (date and time information) for the user regarding when and how often that user visited the node in the past (i.e., different website sessions). This is clearly indicated in Figure 3 cited by the Examiner, where the displayed information clearly shows indication of a user's past visits over an elapsed time of years. Clearly this has nothing to do with dynamic client-side breadcrumbing for a single website navigation session by a user in the manner of the invention.

       For these reasons, the Examiner is respectfully requested to withdraw the rejection of amended independent Claims 33, 41, 49 and 58 and all claims dependent directly or indirectly dependent thereon.

       Furthermore, with respect to the Examiner's reliance upon the reference "Cookies" in his rejection of Claims 3-4, 10, 14-15, 20, 24-25 and 31, respectfully, this reliance is misplaced. Cookies, as acknowledged by the Examiner, are simply text files

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stored at the client. While the present invention as set forth in Claim 3, for example, utilizes cookies for storing breadcrumbs (data), they are being operatively utilized in conjunction with a novel system and method that provides dynamic client-side generation of breadcrumbs that are completely performed at the client by an executable (javascript) engine that has been downloaded in each web-page a user visits. Clearly, the Cookies reference does not teach or suggest this whether taken alone or in combination with "Yahoo" or Wecker.

In view of the foregoing amendments and remarks, this application is now believed to be in condition for allowance, and a Notice of Allowance is respectfully requested. If the Examiner believes a telephone conference might expedite prosecution of this case, it is respectfully requested that he call applicant's attorney at (516) 742-4343.

Respectfully submitted,

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